

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

**STEPHEN MELISE,
Plaintiff**

v.

**COYNE-FAGUE, et. al.,
Defendants**

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C.A. No. 1:17-cv-00490-MSM-PAS

PLAINTIFF'S FIRST EXPERT DISCLOSURE

Pursuant to Fed. R. Civ. P. 26(a)(2)(C), Plaintiff hereby states that the following individual may provide testimony at trial to present evidence under R.I. R. Evid. 702, 703 and/or 705.

A. Witness

Marianne Warren, N.P.
Rhode Island Department of Corrections
40 Howard Avenue
Cranston, RI 02920

N.P. Warren is a nurse practitioner licensed to practice medicine as a nurse practitioner in the State of Rhode Island. During the relevant time, N.P. Warren was one of Plaintiff's treating medical providers.

B. Subject Matter on Which Witness is Expected to Testify

As one of Plaintiff's treating medical providers during the relevant time period, N.P. Warren is expected to testify as to the examination, diagnosis, care, and treatment of Plaintiff's osteoarthritis and sleep disorder, as well as other medical and/or associated or resulting impairments, (collectively "disabilities") during the relevant time period, including Plaintiff's history and/or records of said disabilities, limitations to any major life activities resulting from said disabilities, and Plaintiff's need for accommodations, including but not limited to

assignment to a bottom bunk, necessitated in whole or in part by Plaintiff's said disabilities.

C. Summary of Facts, Opinions, and Grounds

N.P. Warren treated Plaintiff for his disabilities and associated or resulting impairments since at least November 12, 2014 until Plaintiff's sustained injury on June 21, 2016.

N.P. Warren is expected to offer expert medical opinions to a reasonable degree of medical certainty pursuant to Fed. R. Evid. 702, 703 and/or 705, in line with testimony provided in a deposition taken on September 29, 2021, relative to the following: 1) that Plaintiff has suffered from and received treatment for his disabilities and associated or resulting impairments since at least 2014; 2) that Plaintiff's disabilities and associated or resulting impairments substantially impaired his major life activities including his ability to climb a ladder, concentrate, sleep, and stay awake; 3) that from on or about 2015 through 2016, Plaintiff necessitated accommodations including but not limited to an assigned bottom bunk, necessitated in whole or in part by Plaintiff's said disabilities; 4) that N.P. Warren submitted multiple orders for Plaintiff to be assigned a bottom bunk, based on her evaluation of Plaintiff's disabilities; 5) that after on or about November 30, 2015 and June 21, 2016 when Plaintiff fell from a top bunk, N.P. Warren also submitted orders for Plaintiff to be assigned a bottom bunk; and, 6) the reported injuries suffered by Plaintiff following his falls on November 30, 2015 and June 21, 2016 and the causal relationship between Plaintiff's injury and security's denial of bottom bunk orders. Further, N.P. Warren is expected to offer testimony regarding pertinent records related to Plaintiff's disabilities produced by Defendant Rhode Island Department of Corrections in response to Plaintiff's Request for Production of Documents.

D. Reservation of Rights

Plaintiff reserves the right to supplement his Fed. Ct. R. Civ. P. 26(a)(2)(C) disclosures

and the right to present any expert witness at trial in rebuttal to testimony of expert witnesses presented by Defendants or any other party.

Plaintiff,
STEPHAN MELISE,
By his attorney,

Dated: March 17, 2022

/s/ Chloe Davis
Chloe Davis, Esq., Bar No. 9334
2374 Post Road, Suite 201
Warwick, RI 02886
Phone: (401) 739-9690; Fax: (401) 739-9040
E-mail: cad@sinapilaw.com

CERTIFICATION OF SERVICE

Jeffrey G. Latham, Esquire
Christine A. Stowell, Esquire
Tate & Latham
40 Westminster Street, Suite 350
Providence, RI 02903
(401) 421-7400
jlatham@tatelawri.com
cstowell@tatelawri.com

Justin J. Sullivan, Esquire
Department of the Attorney General
150 South Main Street
Providence, RI 02903
401-274-4400
jjisullivan@riag.ri.gov

I hereby certify that I caused a true copy of the within document to be delivered electronically upon the above-named attorneys of record on this 17th day of **March, 2022**.

/s/ Chloe A. Davis